

# Exhibit 11

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF  
TENNESSEE GREENEVILLE DIVISION**

**B.P., H.A., and S.H., individually, and on      No: 2:23-cv-00071-TRM-JEM  
behalf of all other similarly situated,**

**Plaintiffs,**

**v.  
City Of Johnson City, Tennessee, et al.,**

**Defendants.**

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**PLAINTIFFS' THIRD SET OF INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO DEFENDANT JUSTIN JENKINS**

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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

**PLEASE TAKE NOTICE** that pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure, Plaintiffs hereby request that Defendant Justin Jenkins respond and produce for inspection and copying, within thirty (30) days after service of these requests for production of documents.

**I. DEFINITIONS**

1.      “ASSETS” means all things of value to which an ownership interest can accrue including but not limited to real property, personal property, securities, and other financial instruments.

2.      “COMMUNICATIONS” means written communications or records of oral communications of any kind that transmit information in the form of facts, ideas, opinions, questions, or otherwise. They include electronic communications such as emails, online messages, chat logs, mobile messages, talk-to-text messages, machine-generated messages, facsimiles, and telephone communications; as well as letters, memoranda, exchanges of written or recorded information, in-person meetings, and events attended by Responding Party and its representative.

3. “DOCUMENT” means the term as used in Rule 34(a) of the Federal Rules of Civil Procedure. A draft or non-identical copy is a separate document within the meaning of this term.

4. “REGARDING” means referring to, reflecting, concerning, or being in a way logically or factually connected with the matter discussed.

5. “SEAN WILLIAMS” refers to the person named Sean Christopher Williams described in Plaintiffs’ Complaint.

6. “YOU” and “YOUR” means Justin Jenkins, and includes any trust or estate acting on his behalf.

7. “JCPD” means the Johnson City Police Department.

## **II. INSTRUCTIONS**

1. Please produce the DOCUMENTS responsive to the numbered requests below that are in YOUR possession, custody, or control.

2. The relevant time period for these Requests is January 1, 2018, to present.

3. Construe the terms defined above and the individual requests for production and inspection broadly, to the fullest extent of their meaning.

4. If YOU file a timely objection to any portion of a request, definition, or instruction, produce DOCUMENTS responsive to the remaining portion.

5. If any DOCUMENT is withheld, in whole or in part, for any reason, including but not limited to any claim of privilege of any kind, work-product protection, trade secret, confidentiality, or any basis asserted under Tennessee Code Annotated § 10-7-504, please set forth separately with respect to each DOCUMENT: (a) a description of the privilege or grounds for confidentiality claimed; (b) the author(s) of the DOCUMENT (identifying who, if any, are attorneys); (c) the recipient(s) of the DOCUMENT, including all persons who received copies of

the DOCUMENT (identifying who, if any, are attorneys); (d) the subject or title of the DOCUMENT; (e) the date of creation and/or date the DOCUMENT was sent; (f) a description of the DOCUMENT as set forth in Rule 26(b)(5)(A)(ii) of the Federal Rules of Civil Procedure; (g) the Bates range of the DOCUMENT; (h) a redacted version of the DOCUMENT; and (i) the privilege log reference number. Please produce any privilege log or list in an Excel spreadsheet or other format capable of electronic sorting.

6. Please produce any purportedly privileged DOCUMENT containing non-privileged material and redact only the portion purportedly privileged.

7. Pursuant to Rule 34(b) of the Federal Rules of Civil Procedure, produce all electronically stored information in native format (including metadata) whenever possible, or in the format mutually agreed upon by the parties.

8. Because these requests are ongoing, please promptly produce any DOCUMENT discovered or obtained after the service of these requests.

9. Produce all DOCUMENTS in a Bates Stamped Format.

10. If YOU are refusing to produce a DOCUMENT on the basis of privilege, please provide a Privilege Log.

11. If YOU are responding to an interrogatory by referring Plaintiffs to a DOCUMENT, please identify any DOCUMENT with specificity and by Bates range.

### **III. INTERROGATORIES**

1. Please state whether YOU were interviewed by Eric Daigle, or any associate with the Daigle Law Group, and if so, provide (a) the date of the interview, (b) all individuals present at the interview, and (c) the topics covered.

2. Please state whether YOU were interviewed by any law enforcement agent or prosecutor (to include but not limited to, officers or agents of the Johnson City Police Department, the Tennessee Bureau of Investigation, the Federal Bureau of Investigation, the U.S. Department of Justice, or the District Attorney's Office for the First Judicial District) on any topic relating to SEAN WILLIAMS, the seizure of WILLIAMS' digital devices or safe on or about September 20, 2020, the public corruption investigation/inquiry of JCPD, and/or the sexual assaults of B.P., A.A., K.B., K.H., and A.S., and if so, provide (a) the date of the interview, (b) the name of the individuals present for the interview (including any representatives from JCPD, Defendant City, or their counsel), and (c) the topics covered.

3. Please state whether YOU conducted any searches on either public or law enforcement databases REGARDING the ASSETS of SEAN WILLIAMS, including his real property, any tax sales of his property, and any other transactions involving ASSETS of WILLIAMS.

4. Identify any Gmail accounts used for YOUR Personal Digital Assistants ("PDAs"). State whether those email accounts have been searched for responsive DOCUMENTS as part of this case.

#### **IV. DOCUMENT REQUESTS**

1. All receipts for purchases and/or sales over \$1,000 YOU made on Facebook Marketplace for the relevant time period.

2. All receipts for purchases and/or sales of the following ASSETS:

- 2018 Toyota Tundra
- 2006 Toyota Tundra
- 2016 Pop-up Camper

- 2021 Forest River Camper
  - 2018 Forest River RPOD Camper
  - 2006 Four Winns Horizon Speedboat
3. All titles held on RVs, boats, and cars in YOUR name, including titles no longer held in YOUR name, but which were held during the relevant time period.
4. Mortgage records for 107 Shady Rest Road during the relevant time period.
5. All bank records showing any deposit (other than salary payments from the Johnson City Police Department) over \$2,000, which YOU made during the relevant time period.
6. Any written COMMUNICATIONS between YOU or YOUR counsel with the FBI, DOJ, TBI, or DA's office relating to SEAN WILLIAMS, the investigation into SEAN WILLIAMS, the public corruption investigation and/or inquiry into JCPD, or YOUR role in the seizure of WILLIAMS' safe or digital devices on or about September 20, 2020.

Dated: May 15, 2024

Respectfully submitted,

/s/ Elizabeth A. Kramer  
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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY certify that a copy of the foregoing has been served via email on May 15, 2024 to counsel of record:

<p>K. Erickson Herrin HERRIN, McPEAK &amp; ASSOCIATES 515 East Unaka Avenue P. O. Box 629 Johnson City, TN 37605-0629 Email: lisa@hbm-lawfirm.com</p> <p>Emily C. Taylor WATSON, ROACH, BATSON &amp; LAUDERBACK, P.L.C. P.O. Box 131 Knoxville, TN 37901-0131 Email: etaylor@watsonroach.com</p> <p><i>Attorneys to Defendants, Johnson City, Tennessee, Karl Turner, in his individual and official capacities, Captain Kevin Peters, in his official capacity, and Investigator Toma Sparks, in his official capacity</i></p> <p>Jonathan P. Lakey Burch, Porter, &amp; Johnson, PLLC 130 N. Court Ave. Memphis, TN 38103 901-524-5000 jlakey@bpjlaw.com <i>Attorney to Defendant City of Johnson City, Tennessee</i></p>	<p>Daniel H. Rader III Daniel H. Rader IV MOORE, RADER &amp; YORK PC 46 N. Jefferson Avenue P.O. Box 3347 Cookeville, TN 38502-3347 danrader@moorerader.com danny@moorerader.com <i>Counsel for Kevin Peters in his individual capacity</i></p> <p>Kristin Ellis Berexa Ben C. Allen FARRAR BATES BEREXA 12 Cadillac Drive, Suite 480 Brentwood, TN 37027-5366 kberexa@fbb.law ballen@fbb.law <i>Counsel for Toma Sparks in his individual capacity</i></p> <p>Keith H. Grant Laura Beth Rufolo Robinson, Smith &amp; Wells, PLLC 633 Chestnut Street, Suite 700 Chattanooga, TN 37450 E-mail: kgrant@rswlaw.com <i>Counsel for Justin Jenkins in his individual capacity, Jeff Legault in his individual capacity and Brady Higgins in his individual capacity</i></p>
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/s Elizabeth A. Kramer  
Elizabeth A. Kramer